## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA WINSTON-SALEM DIVISION

In re:

Chapter 11

Alternative Brands, Inc. Renegade Holdings, Inc. Renegade Tobacco Co. Case No. B-09-50141 Case No. 09-50140 Case No. 09-50143

Debtors.

## APPLICATION TO APPEAR PRO HAC VICE

Pursuant to Local Rule 2090-1(b) of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Middle District of North Carolina, Oleg Kobelev, files this Application to Appear *Pro Hac Vice* effective *nunc pro tunc* June 25, 2010 for the limited and special purpose of appearing as counsel for the States<sup>1</sup> in the above-referenced cases. In support of this Application, Applicant shows the Court the following:

- 1. These States have requested that Oleg Kobelev appear on their behalf as their counsel.
- 2. Applicant is a resident of Arlington, Virginia. Mr. Kobelev is employed by the National Association of Attorneys General ("NAAG"), at 2030 M. Street N.W., 8<sup>th</sup> Floor, Washington, DC 20036, (202) 326-6251. NAAG is an instrumentality of state government and is comprised of all of the Attorneys General of the states of the United States, as well as of American Samoa, the District of Columbia, Guam, the Northern Mariana Islands, Puerto Rico, and the Virgin Islands. Mr. Kobelev is licensed in New York.
- 3. Applicant has been admitted to practice in the following courts and is a member in good standing of each of these courts:
  - a. New York States Courts 2007
  - b. U.S. District Court for the Southern District of New York –2007
  - c. U.S. Court of Appeals for the District of Columbia Circuit 2008
- 4. Applicant has never been disciplined by any court or administrative body.
- 5. Applicant learned very shortly before June 25, 2010 -- the day of the hearing on the motion for a new trial pursuant to Fed. R. Evid. 59 -- that he may need to enter his

<sup>&</sup>lt;sup>1</sup> The States include Alabama, Arkansas, Arizona, Georgia, Kansas, Kentucky, Louisiana, North Carolina, North Dakota, New Mexico, Pennsylvania, South Carolina, Tennessee, Virginia, Washington, and West Virginia.

appearance in the above cases. The entry of appearance was necessary because there existed a possibility that Ms. Molteni's testimony would need to be taken in the event her affidavit was not admitted into evidence. Therefore, Applicant respectfully requests that his application to appear *pro hac vice* be effective *nunc pro tunc* June 25, 2010.

- 6. Applicant has never filed for permission to appear pro hac vice within the State of North Carolina
- 7. Applicant has read and is familiar with the Local Bankruptcy Rules, the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence, and he submits to the disciplinary jurisdiction of this Court for any misconduct in connection with this matter.
- 8. Gregory B. Crampton of Nicholls & Crampton, P.A., 4300 Six Forks Road, Suite 700, Raleigh, NC 27609 or P.O. Box 18237, Raleigh, NC 27619, (919) 781-1311, has been designated as the member of the bar of the Court who maintains an office in North Carolina for the practice of law with whom the Court and opposing counsel may readily communicate regarding conduct of these cases and upon whom papers shall be served.

WHEREFORE, Oleg Kobelev respectfully requests that the Court enter an Order admitting him for the purpose of representing the States as counsel in connection with these cases and any proceeding pending herein, and requests that electronic mailing of all filings, orders and notices be made upon him at okobelev@naag.org.

Respectfully submitted this 28th day of June, 2010.

s/Oleg Kobelev

Oleg Kobelev, Esq.
NATIONAL ASSOCIATION OF
ATTORNEYS GENERAL
2030 M. Street N.W., 8<sup>th</sup> Floor
Washington, DC 20036
Telephone: (202) 326-6033

Fax: (202) 521-4052 Email: okobelev@naag.org

Agreed to:

s/Gregory B. Crampton

Gregory B. Crampton North Carolina State Bar No. 991 NICHOLLS & CRAMPTON, P.A. P. O. Box 18237

Raleigh, NC 27619

Telephone: 919-781-1311 Local Counsel for the States

## **CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing **APPLICATION TO APPEAR** *PRO HAC VICE* was served this day by placing copies thereof in a depository under the exclusive care and custody of the United States Postal Service in postage prepaid envelopes and properly addressed as follows:

Alternative Brand, Inc. 321 Farmington Road Mocksville, NC 27028

SERVICE VIA CM/ECF ONLY Michael D. West, Esq. Bankruptcy Administrator P.O. Box 1828 Greensboro, NC 27402

SERVICE VIA CM/ECF ONLY John A. Northern Northern Blue, LLP P.O. Box 2208 Chapel Hill, NC 27515-2208

This 28<sup>th</sup> day of June, 2010.

s/Gregory B. Crampton
Gregory B. Crampton (NCSB #991)